



1850 M Street, N.W., 11th Floor
Washington, D.C. 20036
Telephone: (202) 828-7463

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JUL 30 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Jay C. Keithley
Vice President
Law and External Affairs
United Telephone Companies

July 30, 1993

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20036

92-235

RE: In the Matter of Replacement of Part 90 by Part 88 to Revise the Private Land Mobile
Radio Services and Modify the Policies Governing Them

Dear Mr. Caton:

Attached are the Reply Comments of the United and Central Telephone Companies in
the matter referenced above.

Sincerely,

A handwritten signature in cursive script that reads "Jay C. Keithley".

Jay C. Keithley
Vice President
Law and External Affairs

Attachment

JCK/mlm

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

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)
Replacement of Part 90 by Part 88 to
Revise the Private Land Mobile Radio
Services and Modify the Policies
Governing Them)

PR Docket No. 92-235**REPLY COMMENTS OF THE UNITED AND CENTRAL TELEPHONE COMPANIES**

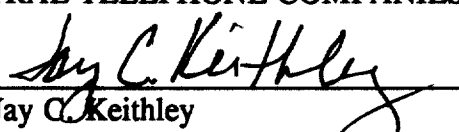
The United and Central Telephone companies ("United" and "Central") hereby respectfully reply to the comments of other parties and further support the Commission's efforts to promote more efficient use of the radio spectrum below 512 MHz that is allocated to the Private Land Mobile Radio ("PLMR") services. In general, United and Central support the comments of the majority of PLMR users that seek to slow the implementation of band narrowing in order to mitigate the high costs related to rapid replacement of existing PLMR

United and Central support the plan proposed by the Land Mobile Communications Council ("LMCC").¹ LMCC's Option A proposes that effective January 1, 1994, full power licensees have the voluntary option of employing 12.5 kHz bandwidth equipment and that the Commission establish a 12.5 kHz frequency plan associated with each of the 15 kHz frequencies and a 6.5 kHz channelization plan that could be voluntarily used by licensees on a coordinated basis. Then, effective January 1, 1996, all equipment accepted for new deployment by the Commission, with exceptions for some paging equipment, must be capable of operating at 12.5 kHz or equivalent efficiency. By January 1, 1999, a follow-up rulemaking would be undertaken by the Commission to determine whether 6.25 kHz channels and equipment should be required for all users by January 1, 2014. Further, effective January 1, 2004, all licensees not already on 12.5 kHz equipment (or that with equivalent efficiency) could continue to operate only on a non-interference basis.²

United and Central support this migration schedule because it minimizes the immediate investment in new equipment while proposing a plan that will provide, over time, more spectrum for use by PLMR users. United and Central believe this plan is reasonable and urges its adoption.

Respectfully submitted,

UNITED TELEPHONE COMPANIES
CENTRAL TELEPHONE COMPANIES

By: 
Jay C. Keithley
1850 M Street, N.W., Suite 1100
Washington, D.C. 20036
(202) 857-1030

W. Richard Morris
P.O. Box 11315
Kansas City, MO 64112
(913) 624-3096


THEIR ATTORNEYS

July 30, 1993

¹ See Consensus Plan developed by the Land Mobile Communications Council to Introduce Greater Efficiencies in PLMRS Band Widths and Power Levels. PR Docket No. 92-235. April 28, 1993.

CERTIFICATE OF SERVICE

I, Melinda L. Mills, hereby certify that I have on this 30th day of July, 1993, sent via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Reply Comments of the United Telephone and Central Telephone Companies," in the Matter of Replacement of Part 90 by Part 88 to Revise the Private Land Mobile Radio Services and Modify the Policies Governing Them, PR Docket No. 92-235, filed this date with the Acting Secretary, Federal Communications Commission, to the persons listed on the attached service list.


Melinda L. Mills

President
PCC Communications, Inc.

Town of North Harmony
Office of the Superintendent

John H. Atkinson
General Manager
Shasta Area Safety Communications Agency
P.O. Box 991228

David Beck
1755 N. Racine Street
Appleton, WI 54911

Diane Brandt
Director
Washington County Consolidated
Communications Agency
17853 NW Cornell Road
Beaverton, OR 97006

John A. Brubaker
Fire Chief
Salida Fire Protection District
P.O. Box 1335
Salida, CA 95368

Allen C. Bryant, Jr.
Head of Communications
Atlanta Fire Department
46 Courtland Street, SE
Atlanta, GA 30335

K. D. Bullock
Commanding Officer
Detroit Police Department
Communications Systems Section
Detroit, MI 48226

LeRoy Campbell
Road Supervisor
Stanilaus County Road Department
1716 Morgan Road
Modesto, CA 95358

Richard G. Carlson
Assistant Director
Arizona Department of Public Safety
2102 West Encanto Boulevard
P.O. Box 6638
Phoenix, AZ 85205-6638

Anthony A. Cavallaro
Superintendent
Village of Falconer
101 West Main Street
Falconer, NY 14733

Alvie Chasteen
Chairman
Stephens County Commissioners
-
Duncan, OK 73533

Lee Chew
Chairman
Oklahoma Board of County Commissioners
Washington County Courthouse
420 South Johnstone
Room 108
Bartlesville, OK 74003

E. A. Corral
Fire Chief
City of Houston Fire Department
1010 Girard Street
Houston, TX 77007

Russell L. Daelhing
Highway Superintendent
Seward County Highway Department
County Courthouse
P.O. Box 190
Seward, NE 68434

Aaron R. Deese
Director
Stanley County Emergency Services
201 South Second Street
Albemarle, NC 28001

Gene DeFoe
Communication Service & Electronics
P.O. Box 211
Shoshoni, MY 82649

Robert W. DeLange
President
Montana Chapter APCO
6240 St. Thomas Drive
Missoula, MT 59803

Walter M. Dillard
5509 Dominica
Corpus Christi, TX 75411

Michael K. Dillenbeck
Manager
Grand Traverse
County Road Commission
3949 Silver Lake Road
Traverse City, MI 49684

John Dilworth
Chair
Benton County
Board of Commissioners
180 NW 5th Street
Corvallis, OR 97330-4777

James E. Dunstan
Attorney
Haley, Bader & Potts
4350 North Fairfax Drive
Arlington, VA 22203-1633

Jerry Edwards
Mayor
City of Tigard
13125 SW Hall Boulevard
Tigard, OR 97223

Mary Ellen Epps
State Representative
Colorado House of Representatives
217 Dexter Street
Colorado Springs, CO 80911

Russell H. Fox
Attorney
Gardner, Carton & Douglas
1301 K Street, NW
Suite 900, East Tower
Washington, DC 20005

Gary L. Fulk
Co-Owner
Vanguard Communication Services, Inc.
133 Ridgewood Drive
Mount Airy, NC 27030

Julian P. Gehman
Attorney
Blooston, Mordofsky, Jackson & Dickens
2120 L Street, NW
Washington, DC 20037

R. L. Germann
Henry County Engineer
Courthouse
Napoleon, OH 43545

Stephen M. Gregory
Assistant Commissioner
New York City Fire Department
250 Livingston Street
Brooklyn, NY 11201-5884

Janet S. Grenslitt
Chair
Contra Costa County
Office of Emergency Services
Emergency Communications Advisory Body
50 Glacier Drive
Martinez, CA 94553-4896

Eric G. Grove
County Engineer
County of Sussex
Department of Engineering
Plotts Road
Newton, NJ 07860

Anthony Guardino
Chief of Police
Redwood City Police Department
1301 Maple Street
Redwood City, CA 94063

J. Robert Hamrick
Director
Georgia Bureau of Investigation
P.O. Box 370808
Dacatur, GA 30037-0808

Ronald Harbaugh
Assistant Superintendent
City of Cincinnati
Department of Safety
1430 Martin Drive
Cincinnati, OH 45202

Dennis Harkins
Captain of Services
Plainview Police Department
108 W. 9th
Plainview, TX 79072

Jan Hart
City Manager
City of Dallas
1500 Marilla Street
Dallas, TX 75201

Russell Heinselman
Chairman
Town of Brookline
P.O. Box 360
Brookline, NH 03033

Bjarne R. Henderson
Senior Attorney
Northern Indiana Commuter
Transportation District
33 C U.S. Highway 12
Chesterton, IN 43604

Gary L. Hergenrader
Nebraska State Forester
Nebraska Forest Service
University of Nebraska
101 Plant Industry

Ron C. Hoffman
Director of Communications
Harvey County Communications Center
P.O. Box 687
Harvey, KS 67114

Glenn T. Hoynoski
Chief
Colorado Sierra Fire Department
14908 Highway 119
Black Hawk, CO 80403

Ron Hunter
Sheriff
Office of Sheriff
Stephens County
Duncan, OK 73533

Guy Hylton
City Manager
City of Elk City
P.O. Box 1137
Elk City, OK 73648

Christopher D. Imlay
Attorney
Booth, Freret & Imlay
1233 20th Street, NW
Suite 204
Washington, DC 20036

Thomas C. Jorling
Commissioner
State of New York
Department of Environmental Conservation
Albany, NY 12233-1010

Thomas J. Keller
Attorney
Verner, Liipfert, Bernhard
McPherson and Hand
901 15th Street, N.W.
Suite 700
Washington, DC 20005

Edwin F. Kemp
Senior Manager-Telecommunications
Union Pacific Railroad Company
Missouri Pacific Railroad Company
1416 Dodge Street
Room 232
Omaha, NE 68179-0232

David L. Kim
Communications Administrator
City of Torrance
3031 Torrance Boulevard
Torrance, CA 90509-2970

Howard A. Kirkwood
Chief
Oregon Department of Human Resources
Health Division-Emergency Medical Service
800 N.E. Oregon Street
Portland, OR 97232

Raymond A. Kowalski
Attorney
Blooston, Mordkofsky, Jackson & Dickens
2120 L Street, N.W.
Suite 300
Washington, DC 20037

Ronald J. Krotoszynski, Jr.
Attorney
Covington & Burling

Debra L. Lagapa
Attorney
Levine, Lagapa & Block

Michael G. Loth
Routt County Commissioners Center
P.O. Box 773598
Steamboat Springs, CO 80477-3598

Raymond J. Macado
Chief
Empire Fire District
P.O. Box 556
Empire, CA 95319

Charles R. Malcolm
Public Works Director
Morrow County
P.O. Box 453
Lexington, OR 97839

David J. Manzella
Director of Public Works
City of Dunkirk
Department of Public Works
City Hall
Dunkirk, NY 14045

Jerry Martin
Chairman
Hughes County Commissioners
P.O. Box 914
Holdenville, OK 74848

Jimmy E. Martin
Sheriff
Irion County
Sheriff's Office
P.O. Box 859
Mertzon, TX 76941

Gary W. Maxwell
Superintendent
Richland County Highway Department
Route 2, Box 511
Olney, IL 62450

Gary W. McConnell
Director
Georgia Emergency Management Agency
P.O. Box 18055
Atlanta, GA 30316-0055

Harlin R. McEwen
Chief
Ithaca Police Department
120 East Clinton Street
Ithaca, NY 14850-5689

Lois Menzles
Director
State of Montana
Department of Administration
Capitol Station
Helena, MT 59620

Carl L. Michael
General Maintenance Superintendent
Jackson County
Department of Public Works
200 Antelope Road
White City, OR 97503

Ted C. Moore
Chairman
Grant County Commissioners
Courthouse Room 104
Medford, OK 73759

Joe Morales
Undersheriff
Summit County Sheriff's Department
P.O. Box 68
Breckenridge, CO 80424

James R. Moyer
Sandusky County Engineer
2500 West State Street
Freemont, OH 43420

Sam Nuchia
Chief of Police
Houston Texas Police Department
61 Riesner Street
Houston, TX 77002

Arnold W. Oliver
Executive Director
Texas Transportation Department
125 East 11th Street
Austin, TX 78701-2483

William L. Orris, Jr.
Engineer
Branch County Board
of Board Commissioners
23 E. Garfield Avenue
P.O. Box 158
Coldwater, MI 49036

Robert D. Page
County Engineer
Peoria County Highway Department
6915 West Plank Road
Peoria, IL 61604-5246

Curtis C. Parsons
Division Operations Manager
Enron Oil & Gas Company
P.O. Box 250
Big Piney, WY 83113

Melvin E. Perry
Communications Coordinator
Bakersfield Public Works Department
Equipment Division
4101 Truxtun Avenue
Bakersfield, CA 93309

Harold P. Quinn, Jr.

Don. Boone

John B. Richards
General Counsel
Keller & Heckman
1000 G Street, N.W.
Spring 500 West

George W. Riedesel
Director
Chautauqua County
Department of Public Works
454 North West Street

Elaine W. Sexton
Communications Director
Hall County Central Communications
P.O. Box 1435
Gainesville, GA 30503

James E. Shaw
Director of Public Safety
California State University, Stanislaus
801 West Monte Vista Avenue
Turlock, CA 95380

Jeffrey L. Sheldon
Associate General Counsel
Utilities Telecommunications Council
1140 Connecticut Avenue, NW
Suite 1140
Washington, DC 20036

Laurence H. Sheldon
Fire Chief
Modesto Fire Department
610 11th Street
P.O. Box 642
Modesto, CA 95353

Julian L. Shepard
Vice President
Association for Maximum Service
Television, Inc.
1400 16th Street, NW
Suite 610
Washington, DC 20036

William G. Sherk
Director of Utilities
City of Rocky Mount
One Government Plaza
P.O. Box 1180
Rocky Mount, NC 27802-1180

Eric Shimmel
Vice President
Telecommunications Industry Association
2001 Pennsylvania Avenue
Suite 800
Washington, DC 20006

Eugene Smith
Chairman
Eden-Farson Fire Control District
P.O. Box 61
Farson, WY 82932

Warren O. Somerfeld
Director
Department of Transportation
Traffic Engineering/Parking
DOT Field Operations
1120 Sayle Street
Madison, WI 53715

Ben Springfield
Emergency Mangement Director
Lincol County Civil Emergency Management
County Commissioners Office
Licoln County Courthouse
Chandler, OK 74834

L. H. Stolz
Administrator
A&I Telecommunications Division
State of Wyoming
2001 Capitol Avenue
Room B1
Cheyenne, WY 82002-0060

Mike Sullivan
Governor
State of Wyoming
Office of the Governor
Cheyenne, WY 82002

Linda Taliaferro
Commission Chairman
Sweetwater County
Board of Commissioners
P.O. Box 730
Green River, WY 82935

Mark A. Tomany, Lt.
Communications Officer
Minooka Fire Department
P.O. Box 309
413 Mondomamin Street
Minooka, IL 60447

Steve Tucker
Director
University of Alambama
Department of Public Safety
209 Gorgas Hall
Box 870180
Tuscaloosa, AL 35487-0180

Gene H. Unger
Director of Public Works
Clallam County Public Works Dept.
Courthouse
223 East Fourth Street
Port Angeles, WA 98362-3098

Thomas VanderMolen
3405 North 37th Terrace
St Joseph, MO 64506

Dale B. Wagner, Jr.
County Engineer
Pope County Highway Department
114 West Minnesota Avenue

Rodney E. Wright
Executive Director
Adams County Communications Center, Inc.
7321 Birch Street
Commerce City, CO 80022

David C. Yandell
Assistant Administrator
Oregon Emergency Management
595 Cottage Street NE
Salem, OR 97310

Judith L. Young
Attorney
Southern California Gas Company
555 West Fifth Street
Los Angeles, CA 90013-1011

Carole C. Harris
Keller and Heckman
1001 G Street, N.W.
Suite 500 West
Washington, D.C. 20001
Attorney for Northern States Power Company

Frank Hedley
Floyd Sanderson
Legislative Oversight Committee
1455 Response Road, Suite 190
Sacramento, CA 95815

Junior Huckaby
Harper County Community Dist. #3
Route #2, Box 52
Selman, OK 73834

E. Phillip Miller, DVM
Jefferson County Firefighters Assoc.
Route 3, Box 142
Oskaloosa, KS 66066

ITS*
1919 M Street, N.W., Room 246
Washington, D.C. 20554

Joel Ader*
Staff Manager - Federal Regulatory Resource Center
Bellcore
2101 L Street, N.W., 6th Floor
Washington, D.C. 20037